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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

DERRELL LEE CHRISTY, JR.,  
  
Petitioner,  
  
v.  
  
WILLIAM HUTCHINGS, *et al.*,  
  
Respondent(s).

Case No. 2:21-cv-00132-APG-BNW

**UNOPPOSED MOTION FOR  
ENLARGEMENT OF TIME TO FILE  
RESPONSE TO SECOND AMENDED  
PETITION FOR WRIT OF HABEAS  
CORPUS (ECF NO. 18)**

**(FIRST REQUEST)**

Respondents move this Court for an enlargement of time of forty-five (45) days from the current due date of February 28, 2022, up to and including April 14, 2022, in which to file their Response to Christy's Second Amended Petition for Writ of Habeas Corpus (ECF No. 18). This Motion is made pursuant to FED. R. CIV. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached declaration of counsel.

This is the first enlargement of time sought by Respondents and is brought in good faith and not for the purpose of delay.

DATED February 28, 2022

Submitted by:

AARON D. FORD  
Attorney General

By: /s/ Katrina A. Samuels  
Katrina A. Samuels (Bar. No. 13394)  
Deputy Attorney General

**DECLARATION OF KATRINA A. SAMUELS**

STATE OF NEVADA     )  
                                  ) ss:  
COUNTY OF CLARK    )

I, Katrina A. Samuels, being first duly sworn under oath, depose and state as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada and am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I have been assigned to represent Respondents in *Derrell Lee Christy Jr. v. William Hutchings, et al.*, Case No. 2:21-cv-00132-APG-BNW, and as such, have personal knowledge of the matters contained herein.

2. This Motion is made in good faith and not for the purpose of delay.

3. The Response to Christy's Second Amended Petition is currently due on Monday, February 28, 2022.

4. Respondents have been unable with due diligence to timely complete the response.

5. In the past few months, Respondents filed a Reply Brief in the Nevada Supreme Court due December 6, 2021 (*In the Matter of the Application of Breck Warden Smith for a Writ of Habeas Corpus*, No. 82696); an answer due December 16, 2021 (*Mario A. Lopez v. Brian E. Williams, et al.*, Case No. 2:19-cv-01308-APG-NJK); an opposition to a Motion for Leave to Amend Petition for Writ of Habeas Corpus due January 5, 2022 (*Justin Odell Langford v. Warden Renee Baker, et al.*, Case No. 3:19-cv-00594-MMD-WGC); a response to a Motion for Discovery due January 18, 2022 (*Christopher Lenard Blockson v. Jerry Howell, et al.*, Case No. 2:21-cv-00731-GMN-VCF); a response to a Motion for Stay and Abeyance due January 19, 2022 (*Justin Odell Langford v. Warden Renee Baker, et al.*, Case No. 3:19-cv-00594-MMD-WGC); a Motion to Dismiss due January 24, 2022 (*Allen S. Heusner v. Dwight Neven et al.*, Case No. 2:14-cv-01119-RFB-GWF); an opposition to a Motion to Supplement Petition for Writ of Habeas Corpus due January 26, 2022 (*Sanjiv N. Daveswar v. Garrett, et al.*, Case No. 3:20-cv-00612-MMD-CLB); a response to Motion for Appointment of Counsel due January 26, 2022 (*Sanjiv N. Daveswar v. Garrett, et al.*, Case No. 3:20-cv-00612-MMD-CLB); a Motion to Dismiss due February 4, 2022 (*Christopher Lenard Blockson v. Jerry Howell, et al.*, Case No. 2:21-cv-00731-GMN-VCF); a Motion to Dismiss due February 10, 2022 (*Cory O'Neal Brewer v. William Gittere, et al.*, Case No. 3:20-cv-00396-MMD-CLB); a response to a Request for Judicial Notice due February 23,

2022 (*Justin Odell Langford v. Warden Renee Baker, et al.*, Case No. 3:19-cv-00594-MMD-CSD); and various responses in state post-conviction cases.

6. I communicated with counsel for Christy regarding this extension and she does not object to this request.

7. Based on the forgoing, Respondents respectfully request an enlargement of time of forty-five (45) days from the current due date, February 28, 2022, up to and including April 14, 2022, to file our response to Christy's Second Amended Petition.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 28, 2022.

/s/ Katrina A. Samuels  
Katrina A. Samuels (Bar. No. 13394)  
Deputy Attorney General

IT IS SO ORDERED:

  
UNITED STATES DISTRICT COURT

Dated: March 1, 2022